

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

JUL 06 2020

David J. Bradley, Clerk of Court

United States of America

v.

Huang, Yen-Tsun

Case No. C-20-1325M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 04, 2020 in the county of Brooks in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

Title 21 USC 841 (a)(1)  
Title 21 USC 841 (b) (1) (A)

## Offense Description

Knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance in Schedule II of the Controlled Substance Act of 1970, to wit; 0.946 kilograms of methamphetamine, approximate gross weight.

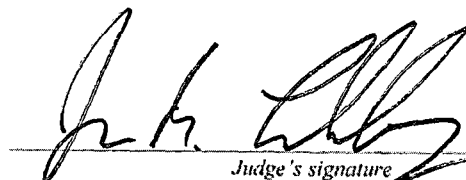
This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to,  
signature attested telephonically per Fed. R. Crim. P. 4.1.  
And probable Cause found:Date: 07/06/2020City and state: Corpus Christi, Texas  
Complainant's signature

DEA TFO Jason G Rhodes

Printed name and title

  
Judge's signature

U.S. Magistrate Judge Jason B. Libby

Printed name and title

Yen-Tsun HUANG

Attachment "A"

On July 4, 2020, Border Patrol Agent (BPA) Gerardo Quintero was assigned immigration inspection duties at the Falfurrias, TX Border Patrol Checkpoint located 13 miles south of Falfurrias, TX on U.S. Highway 281.

At approximately 9:10 P.M. a white 2020 Toyota Corolla SE arrived at primary inspection with three visible occupants. BPA Quintero first greeted the driver, later identified as Amedgar Ezequiel MARTINEZ, by saying "Hello, how are you doing?" and MARTINEZ responded, "Good". BPA Quintero also noticed the front seat passenger, later identified as Jennifer Ann WILKINS, and the backseat passenger, later identified as Yen Tsun HUANG. BPA Quintero then asked all the occupants of the vehicle if they were United States citizens, and only MARTINEZ and WILKINS responded "Yes". At this point, MARTINEZ handed BPA Quintero his driver's license. Next, BPA Quintero looked inside the passenger-side rear window and noticed HUANG opening what looked to be a Big Mac burger from McDonald's and took a first bite. BPA Quintero thought it was unusual that someone would wait until the exact moment they got to the checkpoint to start eating, given that the nearest McDonald's is over 60 miles south. BPA Quintero then asked HUANG if he had any documents or any identification. HUANG responded "Yes" and reached for his backpack. While BPA Quintero conducted his immigration inspection, BPA Nathan Smith deployed his service canine "Senna" around MARTINEZ's vehicle. BPA N. Smith advised BPA Quintero that his canine was alerting on MARTINEZ's vehicle. BPA N. Smith advised BPA Quintero to send the vehicle to secondary for further inspection. BPA Quintero then instructed MARTINEZ to pull into secondary and MARTINEZ complied.

Once in the secondary inspection area, all occupants were asked to exit the vehicle. All occupants were asked by the secondary agents if they had any knives or weapons inside the vehicle and/or around their waist area. BPA S. Cobb then performed a pat-down on HUANG and felt a brick-like object strapped around each thigh. BPA S. Cobb then asked HUANG what he had around his thighs to which HUANG did not respond. BPA S. Cobb then escorted HUANG inside the checkpoint to perform a more thorough search on HUANG. Once inside the checkpoint, BPA S. Cobb and BPA Z. Lynn asked HUANG to pull his jeans down. At this point, both agents discovered HUANG had black tape around his shorts holding three bundles to his legs. When BPA S. Cobb asked HUANG what it was, HUANG replied "Meth". At this time HUANG, MARTINEZ

and WILKINS were placed under arrest for possession of a controlled substance and were escorted into the checkpoint for further processing.

The three bundles found, contained a crystal-like substance that tested positive for methamphetamine weighing a total of 0.946 Kg.

On 7-5-2020 DEA TFO Jason Rhodes and DEA SA Christopher Conchin arrived at the Falfurrias Border Patrol Checkpoint. TFO Rhodes and SA Conchin interviewed WILKINS, MARTINEZ, and HUANG.

During the interview of WILKINS she indicated that she had no idea that HUANG was carrying methamphetamine on his person. WILKINS denied having anything to do with HUANG's illegal narcotics.

During the interview of MARTINEZ he indicated that he was called by his roommate Joseph PATCH to pick up WILKINS and HUANG from a house in McAllen, Texas. MARTINEZ stated that he asked WILKINS and HUANG if they had anything illegal on their person, before WILKINS and HUANG got into his vehicle (2020 white Toyota Corolla). MARTINEZ stated that both WILKINS and HUANG denied having any illegal narcotics with them.

TFO Rhodes contacted AUSA Robert Thorpe, who accepted prosecution of HUANG.

HUANG was transported to the Coastal Bend Detention Center. Exhibit 1 (0.946 kilograms of methamphetamine) was transported to DEA CCRO where it was secured in drug vault.